

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

MICHAEL SHILLAN,
Petitioner,

CASE NO.: 2025-DR-6662-SB

DIVISION: FX

vs.

FRANCINE CHANG,
Respondent/Third-Party Plaintiff,

and

LIBRA CAPITAL ADVISORS, INC. and
WOW LOTTERY VENTURES, LLC,
Third-Party Defendants.

**RESPONDENT/THIRD-PARTY PLAINTIFF'S NOTICE OF PRODUCTION FROM
NON-PARTY**

TO: **Andrew S. Lieberman, Esq.**
WiseLieberman, PLLC
Email: filings@wiselieberman.com
Counsel for Petitioner

Jordan A. Shaw, Esq.
Shaw Lewenz
Primary Email: jshaw@shawlewenz.com
Secondary Email: lgrealy@shawlewenz.com
Counsel for Third-Party Defendant WOW Lottery Ventures LLC

Zachary D. Ludens, Esq.
Shaw Lewenz
Primary Email: zludens@shawlewenz.com
Secondary Email: mlomastro@shawlewenz.com
Counsel for Third-Party Defendant WOW Lottery Ventures LLC

Lauren N. Palen, Esq.
Shaw Lewenz
Primary Email: lpalen@shawlewenz.com
Secondary Email: kackerman@shawlewenz.com
Counsel for Third-Party Defendant WOW Lottery Ventures LLC

PLEASE TAKE NOTICE that after 10 days from the date of service of this Notice if service is by delivery, facsimile, or e-mail, or 15 days if service is by mail, and absent any timely objection, the undersigned will issue the attached Subpoena Duces Tecum Without Deposition directed to **Spectrum Gaming Group FL, LLC** to produce the documents described in Exhibit A at the time and place stated in the subpoena. Objections must be filed within the time permitted by Rule 1.351 and Rule 12.351. Failure to file a timely objection permits issuance of the subpoena without further notice.

Wife reserves the right to utilize any documents produced pursuant to this subpoena as business records under §90.803, Florida Statutes.

CERTIFICATE OF SERVICE

I CERTIFY that on February 19, 2026, a true and correct copy of the foregoing was furnished through via the Florida Court's E-Filing portal on all counsel of record.

DEBI GHEORGE-ALTEN, P.A.
daltenLaw@att.net
PO Box 771105
Coral Springs, FL 33077-1105
954/575-9229 (Telephone)

/s/ Debi Gheorge-Alten
Debi Gheorge-Alten, Esq.
Florida Bar No.: 123455

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

MICHAEL SHILLAN,
Petitioner,

CASE NO.: 2025-DR-6662-SB

DIVISION: FX

vs.

FRANCINE CHANG,
Respondent/Third-Party Plaintiff,

and

LIBRA CAPITAL ADVISORS, INC. and
WOW LOTTERY VENTURES, LLC,
Third-Party Defendants.

SUBPOENA FOR PRODUCTION OF DOCUMENTS FROM NONPARTY

THE STATE OF FLORIDA

TO: **Spectrum Gaming Group FL, LLC**
c/o Registered Agent:
Frederic E. Gushin
419 Eagleton Cove Way
Palm Beach Gardens, FL 33418
Attn: Custodian of Records

YOU ARE COMMANDED to produce the documents described in **Exhibit A** to:

DEBI GHEORGE-ALTEN, P.A.
7351 Wiles Rd. Suite 101
Coral Springs, FL 33067

on or before March 22, 2026, at 10:00 a.m.

You may comply by mailing or delivering readable copies to the address above on or before the production date. You will not be required to appear in person.

You may also produce all documents electronically via email to **daltenlaw@att.net** or by secure electronic transfer on or before the production date. If file size exceeds email limits, please contact the undersigned to arrange secure electronic transfer.

Failure to comply with this Subpoena Duces Tecum, including failure to produce all responsive documents by the production deadline, may subject you to sanctions, including contempt of court. Only the attorney whose name appears on this subpoena,

or the Court, may excuse compliance. Unless excused in writing, you must fully respond as directed. You may condition the preparation of copies upon payment of reasonable copying costs, and you may object to this subpoena by providing written notice before the production date.

I CERTIFY that all other parties to this action were provided notice of my intent to issue a subpoena to a non-party for the production of documents without deposition. I further certify that no objections under Florida Rule of Civil Procedure 1.351 or Florida Family Law Rule of Procedure 12.351 were received within the applicable time period; 10 days after service by delivery, facsimile, or e-mail, or 15 days after service by mail.

Dated this 2nd day of March 2026.

DEBI GHEORGE-ALTEN, P.A.
daltenLaw@att.net
PO Box 771105
Coral Springs, FL 33077-1105
954/575-9229 (Telephone)

/s/ Debi Gheorge-Alten
Debi Gheorge-Alten, Esq.
Florida Bar No.: 123455

NOT A CERTIFIED COPY

CERTIFICATE OF AUTHENTICITY OF RECORDS

As the Records Custodian or other qualified person for _____ (“Company”), I, _____ hereby declare, under penalty of perjury or equivalent criminal law governing false statements in the location where this Declaration is signed, that the record(s) attached to this Declaration is the record(s) of a regularly conducted business activity of the Company in that the record(s):

1. I am over the age of 18 and qualified to make this affidavit. I am employed by _____ and also serve as the custodian of records.
2. The attached records are made in the regular course of business.
3. The attached records are kept in the regular course of business.
4. The attached records were made by someone with knowledge at or near the time of the creation of the records.

I declare that there are a total of _____ pages attached to this Declaration and acknowledge that the purpose of this Declaration is to comply with §90.803(6) and §90.202(11), Florida Statutes, which will allow the parties to self-authenticate the record(s) attached to this Declaration for use in the above-styled lawsuit.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Signature

Printed Name

STATE OF FLORIDA
COUNTY OF _____

Sworn to and subscribed before me this ____ day of _____ 2026.

Notary Public

Personally known _____ OR Produced Identification _____

Type of Identification _____

EXHIBIT A

ALL Records Relating to:
Michael Shillan (“Shillan”)
D.O.B.: 10/05/1960
SSN: [REDACTED]

and
WOW Lottery Ventures LLC (“WOW”)
EIN: XX-XX2668
and
Libra Capital Advisors INC (“LCA”)
EIN: XX-XX6634

**For purposes of the requests below, these parties are referred to collectively as
“the Above-Named Subjects.”**

Date Range: January 1, 2022 through the date of production

This subpoena is directed solely to Spectrum Gaming Group FL, LLC. Spectrum Gaming Group FL, LLC must produce all responsive documents within its possession, custody, or control, including documents accessible through any parent, subsidiary, affiliate, officer, director, employee, or representative including but not limited to Spectrum Gaming Group, LLC, Spectrum Gaming Capital, and its principal, Frederic E. Gushin. For purposes of these requests, “Spectrum” means Spectrum Gaming Group FL, LLC and any parent, subsidiary, affiliate, or related entity, including Spectrum Gaming Group, LLC and Spectrum Gaming Capital.

This subpoena does not seek documents protected by the attorney-client privilege or attorney work-product doctrine, except to the extent such protections have been waived by disclosure to third parties. To the extent any document is withheld on the basis of privilege, you must produce a privilege log identifying each withheld document by date, author, recipient(s), general subject matter, type of document, and the specific privilege claimed.

Produce the following documents for the date range identified above:

1. All communications between Spectrum and Shillan, WOW, LCA, or any person acting on their behalf, relating to the feasibility study, valuation analysis, financial modeling, or any other work performed for WOW.
2. All drafts, revisions, redlines, working copies, or preliminary versions of the feasibility study titled “Feasibility Study: Proposed National Tribal Lottery, The All-American Lottery,” dated October 8, 2024.
3. All internal memoranda, notes, analyses, emails, summaries, or other business documents created by or for Spectrum relating to WOW, the All-American Lottery, the WLV Lottery Gaming System, or any aspect of the feasibility study.

4. All documents relating to any assumptions provided by WOW, Shillan, LCA, or any person acting on their behalf, including assumptions relating to revenue, expenses, prize payout percentages, tribal distributions, lottery penetration, market size, terminal counts, or rollout strategy.
5. All documents reflecting Spectrum's internal evaluation of WOW, including any concerns, questions, or issues identified during the feasibility study or valuation analysis.
6. All financial models, valuation models, revenue projections, expense projections, cash flow models, sensitivity analyses, scenario analyses, or other financial analyses created by or for Spectrum relating to WOW or the All-American Lottery.
7. All documents relating to Spectrum Gaming Capital's Indicative Valuation Analysis of WOW, including any market multiples, comparable company analyses, comparable transaction analyses, valuation methodologies, or internal deliberations.
8. All communications between Spectrum and any third party relating to WOW, the All-American Lottery, the feasibility study, or the valuation analysis, including communications with WinSys Lottery LLC, tribal gaming operations, regulatory bodies, or potential investors.
9. All documents relating to any data sources, research materials, market studies, industry reports, or external information relied upon by Spectrum in preparing the feasibility study or valuation analysis.
10. All internal meeting minutes, summaries, notes, agendas, recordings, transcripts, or written accounts of any meeting, call, videoconference, or discussion involving Spectrum relating to WOW, the feasibility study, the valuation analysis, or the All-American Lottery.
11. All documents relating to any background checks, reputation assessments, credibility assessments, or internal evaluations of Michael Shillan performed by or for Spectrum.
12. All documents shared with, received from, or created jointly with Shillan, WOW, LCA, or any person acting on their behalf relating to the feasibility study, valuation analysis, or any proposed investment, partnership, or transaction involving WOW.
13. All documents relating to Spectrum's reliance on, interpretation of, or analysis of the National Indian Gaming Commission Office of General Counsel advisory opinions referenced in the feasibility study.

14. All documents relating to Spectrum's analysis of tribal gaming operations, including terminal counts, per capita spend assumptions, lottery penetration assumptions, and projected rollout schedules used in the feasibility study.
15. All documents relating to Spectrum's analysis of the US lottery industry, including retailer penetration rates, operating costs, technology costs, marketing costs, and any benchmarking used in the feasibility study.
16. All documents relating to Spectrum's analysis of the projected WOW vendor fee, tribal distributions, EBITDA, EBITDA margins, and any other financial metrics referenced in the feasibility study.
17. All documents relating to any proposed, contemplated, attempted, or additional engagements between Spectrum and WOW, including any proposals, statements of work, draft contracts, scoping documents, feasibility study expansions, valuation updates, supplemental analyses, or any discussions regarding future work, additional phases, or expanded deliverables. This includes all internal Spectrum communications evaluating or discussing potential future work for WOW.
18. All documents, communications, notes, emails, analyses, or records created, received, or maintained by Frederic E. Gushin relating to WOW, the feasibility study, the valuation analysis, or any proposed or contemplated engagement with WOW.
19. All internal meeting minutes, summaries, notes, agendas, recordings, transcripts, or written accounts of any meeting, call, videoconference, or discussion involving Frederic E. Gushin relating to WOW, the feasibility study, the valuation analysis, or any proposed or contemplated engagement with WOW.
20. All communications exchanged via text message, SMS, WhatsApp, Signal, iMessage, Telegram, or any other messaging platform between Spectrum or any of its officers, directors, employees, representatives, or agents, including Frederic E. Gushin, and Shillan, WOW, LCA, or any person acting on their behalf, relating to WOW, the feasibility study, the valuation analysis, or any proposed or contemplated engagement with WOW.

This notice is provided pursuant to Administrative Order No. 2.207-6/22

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact William Hutchings, Jr., Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con William Hutchings, Jr., 205 N. Dixie Highway, West Palm Beach, Florida 33401; teléfono número (561) 355-4380, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte William Hutchings, Jr., kòdonatè pwogram Lwa pou ameriken ki Enfim yo nan Tribinal Konte Palm Beach la ki nan 205 North Dixie Highway, West Palm Beach, Florida 33401; telefòn li se (561) 355-4380 nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tandè oubyen pale, rele 711.”